

JURY TRIAL PROCEDURES

Five days before a pretrial, counsel shall submit in writing all complex Motions in Limine with points and authorities and any other matters requiring special attention, like the need for interpreters or subpoenas for bringing in special witnesses from prisons, other countries or state, etc.

At the pretrial, counsel shall submit a list of pattern jury instructions requested on a captioned document, be prepared to discuss the number of alternate jurors needed for the trial, any remaining evidentiary issues, witness problems and any motions in limine. In civil jury trials, counsel shall submit a pre-trial memorandum identifying the legal issues.

The Court does **not** hold trial on Wednesdays because the Court's criminal calendar is on Wednesdays.

Court begins at promptly at 9:00 A.M. and counsel should be prepared to begin their case at this time. If counsel is late, the trial may commence without counsel being present. Counsel are to be present no later then 8:30 A.M. to take up last minute issues. Court remains in session until 2:00 P.M. with modification when necessary to accommodate special circumstances. Counsel will be expected to present testimony until this time, even if a witness' testimony may have to be bifurcated. Court will not be recessed early due to unavailability of witnesses, *except in extraordinary circumstances*, or when necessary to accommodate special circumstances.

Opening statements will be limited to sixty (60) minutes with flexibility when warranted. Counsel are respectfully reminded to not "try the case" or engage in argument in opening statements. Exhibits should be pre-marked prior to opening of court. All approved videotape or audiotape presentations must be cued in advance, and all equipment tested for sound, picture, etc. prior to presenting evidence contained therein. The parties are responsible for reviewing proposed exhibits for redactions to ensure that objectionable material is not seen by the jury. "Dry runs" are encouraged before coming to court, and before court begins. All exhibits are to be handed to the court officer, instead of the witness.

Counsel may not approach a witness unless permission is requested of the Court. Counsel may not make factual argument on objections in front of the jury. All objections are to be addressed to the Court, and no "verbal sparring" or "exchanges" between counsel will be allowed. If an objection is made, and a basis is requested by the Court, the Court only wants a legal basis. Argument on the objection, if needed, will be conducted at sidebar, outside of the hearing of the jury. However, requests for sidebars should be kept to a minimum. Sidebar discussions will be summarized on the record when the jury is recessed. If you wish a witness to testify from a location in the courtroom other than the witness stand, please ask permission of the Court. All emails must be copied to all opposing counsel.